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June 25, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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JUN 25 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Blanketing Interference
MM Docket No. 96-62

Dear Mr. Caton:

Transmitted herewith are an original and nine copies of
COMMENTS OF NEW WORLD RADIO, INC., in the above-captioned Docket.

If there are any questions concerning the enclosure, kindly
contact the undersigned.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS &
HANDLER, LLP

By: 

James M. Weitzman
Counsel to
New World Radio, Inc.

Enclosures

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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JUN 25 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Part 73) MM Docket No. 96-62
of the Commission's Rules)
to More Effectively Resolve)
Broadcast Blanketing)
Interference, Including)
Interference to Consumer)
Electronics and Other)
Communications Devices)

COMMENTS OF NEW WORLD RADIO, INC.

NEW WORLD RADIO, INC., licensee of Radio Station WUST(AM), Washington, D.C., by its counsel, hereby submits its Comments in response to the Notice of Proposed Rulemaking, released April 26, 1996, in the above-captioned rulemaking proceeding ("NPRM").

New World wishes to make a number of points and observations concerning both the text of the NPRM and the specific rule changes proposed therein. It will do so, at greater length, in a supplement to be filed immediately hereafter.

The principal points are as follows:

1. The NPRM, contrary to its stated intent, will not materially facilitate resolution of blanketing interference problems. Using powers granted to the Commission by Congress to enact interference immunity standards for consumer electronic devices will.

2. The NPRM states that many licensees are misinterpreting their responsibilities under the rules for resolution of blanketing interference. The Commission ignores the fact that many consumers have an exaggerated view of their "rights" to be free of any and all interference. This is as much an impediment to interference resolution as any supposed lack of clarity in the present rules. The rules need to make clear the limitations on anyone's absolute ability to be immune from the effects of blanketing interference.

3. The proposal to redefine the 1 mV/m contour for AM stations is misguided, in that, contrary to facilitating the resolution of blanketing complaints, it will promote confusion and delay resolution.

4. Coverage of the rule should not be extended to transient residences or persons nor should the one year period be lengthened in such cases. Doing so would pose an immense burden on licensees and increase the potential for fraudulent or questionable claims for replacement of components.

5. High gain antennas have been, in fact, a factor in some blanketing complaint situations, and the reference to them should not be removed. To the extent that the Commission believes that

they have not been a factor, then leaving unchanged the present reference to high gain antennas will have no negative impact.

6. Telephone interference results from the refusal of manufacturers to design interference-immune telephones. Requiring broadcasters, for the first time, to protect non-RF devices, such as telephones, leaves them hostage to the vagaries of manufacturers' price competition and profit motives. Broadcasters cannot be expected to shoulder the burden of costs that more properly belong to the device manufacturer.

7. The concept that this proceeding can, or any of the past proceedings dealing with blanketing interference or susceptibility of consumer devices to RFI did, have any effect to "stimulate various related industry manufacturers to begin to meet the challenge of producing components that are less susceptible to blanketing interference" -- is simply wishful thinking. The Commission's own experience with this provides compelling evidence to the contrary.

Respectfully submitted,

NEW WORLD RADIO, INC.

By: 

James M. Weitzman
Its counsel

June 25, 1996